

9553.1987(09)

CALIFORNIA LIST LAND DISPOSAL RESTRICTIONS ARE APPLICABLE TO
LIQUID WASTES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 18 1987

Mr. Kenneth W. Kubofcik
President
The Branford Companies
Post Office Box 1056
Branford, Connecticut 06405

Dear Mr. Kubofcik:

This is in response to your letter of May 11, 1987, concerning the applicability of the California list land disposal restrictions to lead-plastic bags manufactured by your company. As you stated, these bags are used to line drums and containers for the storage, containment, and disposal of low level radioactive waste.

The California list prohibitions restrict the land disposal of hazardous wastes containing California list constituents above specified concentration levels. With the exception of hazardous wastes containing halogenated organic compounds (in total concentration greater than or equal to 1000 mg/kg), the restricted wastes are in liquid form. Although the California list covers lead-contaminating wastes, it is confined to liquid hazardous wastes, that contain lead or lead compounds. Based on the information provided in your letter, the lead-plastic radiation shielding bags are not liquid hazardous wastes, nor do the bags appear to meet any other California list waste criteria. As such, the lead-plastic bags would not be subject to the California list prohibitions when discarded.

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I hope this information adequately addresses your concerns. Please feel free to contact Bill Fortune, of my staff at (202) 475-6715, if you have any further questions.

Sincerely,

Stephen R. Weil, Chief
Land Disposal Restrictions Branch